BRIAN GUILFORD, as Personal Representative of the Estate of Deven Guilford v
SGT. JONATHON FROST

Case No. 15-cv-01053

CERTIFICATE REGARDING CONCURRENCE
REGARDING MOTION REQUESTING STAY OF PROCEEDINGS PENDING APPEAL

Exhibit 1 – Heenan Email

Margo VanAlstine

From:	Cynthia Heenan <Heenan@ConLitPC.com>
Sent:	Sunday, September 10, 2017 11:36 AM
To:	Jim Dyer; Margo VanAlstine
Cc:	Constitutional Litigation Assoc. P.C.; Hugh M. Davis; John Philo; Scott Mackela; stevesinas@sinasdramis.com; jimgraves@sinasdramis.com
Subject:	Guilford - plaintiff draft language for concurrence regarding stay

Jim, see below. Thanks, Cynthia

The Plaintiff will stipulate to a stay of proceedings in the trial court, after and/or effective when the Court-ordered Settlement Conference, scheduled for September 27, 2017, is completed. Plaintiff's stipulation on the basis of practical and judicial economy only and it is not intended as a concession that there is merit to Defendant's appeal.

Cynthia Heenan
Constitutional Litigation Associates, P.C.
450 W. Fort Street, Suite 200
Detroit, MI 48226
313-961-2255, Ext. 1/Fax: 313-922-5130
Heenan@ConLitPC.com

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